## IN THE UNI TED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

UNITED STATES OF AMERICA §

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§ CRIMINAL NO. 5:14-cr-00790-OLG

VS.

§ §

MARK ANTHONY GRIMES §

# MOTION TO TEMPORARILY MODIFY CONDITIONS OF PRETRIAL RELEASE TO THE HONORABLE JUDGE OF SAID COURT, UNITED STATES DISTRICT JUDGE FOR THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:

Now comes Defendant, MARK ANTHONY GRIMES, by and through his undersigned counsel, and respectfully moves this Honorable Court for an order allowing Mr. Grimes to have his GPS monitored tracking device removed for a period of time of eight (8) hours, beginning at 11:00 AM and ending at 7:00 PM on May 9, 2016.

I.

Mark Grimes is charged in a seven count indictment with possession and distribution of Child Pornography in violation of 18 U.S.C. § 2252A(a)(2) and 18 U.S.C. §2252A(a) (5)(B).

II.

He was released on bond on October 7, 2014, and has remained on bond through to the present time. His Pre Trial Services Officer is Ms. Norma Aranda. As a condition of bond, Mr. Grimes wears a GPS monitored tracking device.

III.

Mr. Grimes suffers from severe lower back pain which impacts his ability to do daily tasks. He is scheduled to undergo an MRI to help diagnose his back problems on May 9, 2016. The metal in Mr. Grimes' GPS will interfere with the MRI test.

IV.

Accordingly, Mr. Grimes asks this court for permission to have the GPS device removed for eight (8) hours beginning, May 9, 2016, at 11:00 AM and ending May 9, 2016, at 7:00 pm for the medical test.

#### **CERTIFICATE OF CONFERENCE**

Undersigned Counsel has conferred with Assistant United States Attorney Tracy

Thompson and Ms. Thompson is unopposed to this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant, MARK ANTHONY GRIMES, respectfully requests this Honorable Court to grant this Motion to Temporarily Modify Conditions of Pretrial Release, and for such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

KERRISA CHELKOWSKI Law Office of Kerrisa Chelkowski 1017 South Alamo San Antonio, TX 78210 Office (210) 228-9393 Fax (210) 226-7540

BY: /s/ Kerrisa Chelkowski KERRISA CHELKOWSKI STATE BAR NO: 24034373

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BY: /s/ Sam Lock SAM LOCK STATE BAR NO: 24000470

ATTORNEYS FOR DEFENDANT: MARK ANTHONY GRIMES

### **CERTIFICATE OF SERVICE**

We do hereby certify that a true and correct copy of the foregoing Motion to Temporarily Modify Conditions of Pretrial Release was electronically filed with the Clerk of this Honorable Court using the CM/ECF system which will send notification electronically to the United States' Attorney's Office.

SIGNED on this the 6<sup>th</sup> day of May, 2016.

BY: /S/ Sam Lock SAM LOCK

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